

Background

Unimatic Site
Fairfield, NJ

230695



- 1.23 acres with a single-story building, a partially paved parking lot, and a small landscaped area. The building was constructed in 1955 and served as a tool shop and later for die casting.
 - 2001 an assessment was performed as part of an Industrial Site Recovery Act (ISRA) requirement for real estate transfer in New Jersey.
 - Stained soils from around three above ground tanks joined to the building were tested for waste characterization, and high levels (2000 pm) of PCBs were found.
- The soils were partially delineated and after 2,000 tons of soils were excavated and disposed offsite, delineation was stopped.
- The property transfer went through after incomplete delineation, and a trust was established by Unimatic to provide funding for cleanup. The new owners are a LLC (same owners as Framework) who currently occupy the building and assemble picture frames.
 - In July, 2002, PCB contamination was discovered in the groundwater (22 ppb).
 - In 2003, additional 2,100 tons of soil was excavated in an attempt to eliminate the source to groundwater. Additional delineation of soils and groundwater was conducted: levels in groundwater were found to range from non-detect to 448 ppb (361 ppb purged). However, they did not delineate in the soils to 50ppm PCB as required by NJDEP.
- February, 2005, a worker from inside the building approached the cleanup contractor and asked about possible contamination inside of the building, "oil bubbling up from the concrete".
- March, 2005:
 - NJDEP inspected the building upon notification by the contractor, and notified OSHA, who inspected the contractor later in the month.
 - Chip and wipe samples were taken inside the building and high levels of PCB contamination were found.
 - Air samples were taken by clean up contractor. Eight out of ten air samples showed PCB contamination in the vapor phase (ND on filters) ranging from 1.7 – 6.1 μm^3 and above internal EPA removed levels
 - OSHA was unaware of air testing and was not provided with the air results.

- Trisodium phosphate (TSP) cleaner was applied to portions of the concrete floor to remove contamination. It was ineffective, and a concrete planer was used to remove approximately 1/4 inch of the concrete surface and the oil residue covering the surface. Confirmatory sample analysis not received.
- Later in 2005, indoor assessment activities ceased. Contractor was told that there was no more money.
- A Remedial Action Workplan was submitted to NJDEP in September, 2005.
- NJDEP issued a Notice of Deficiency in January, 2007 in part for failure to properly delineate the site. Although revisions were submitted to NJDEP, delineation was never approved. Some financial issues were resolved, however, and following a recommendation by NJDEP, contractor began informal discussions with EPA.
- From May, 2009, through February, 2011, additional sampling was done at the site.
- A Licensed Site Remediation Professional (LSRP) was assigned on February 14, 2011.
- On February 15, 2011, a risk-based disposal application was submitted to EPA for approval.

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After review of the data submitted with the application and discussions with the State (NJDEP), it became clear that this site may have extensive, high level PCB contamination throughout, which the applicant refuses to address to either EPA or NJDEP satisfaction. They proposed the following:

- leave remaining soils in place with a cap (soils were never completely delineated and remain in the soils >500 ppm),
- place a Classification Exception Area (CEA) on the site for the groundwater without completing delineation and with no monitoring or treatment, and
- for the interior concrete surfaces (which include concrete floors and cinder block walls), they propose using 761.30(p) to double wash/rinse, paint and mark the contaminated surfaces with no post ex sampling or air monitoring. This process has not been implemented to date.
- For interior metal surfaces they have indicated they will submit an alternate decontamination proposal to use a scarification process. To date, no such proposal has been submitted.

Communications regarding the site have been between EPA TSCA technical staff and Unimatic legal counsel. EPA has become increasingly concerned about the health and safety of the workers currently employed indoors at the site. Unimatic continues to espouse the poverty mantra.

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